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November 28, 2005

Commission's Secretary  
Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Compliance Letter  
IP-Enabled Services, WC Docket No. 04-36  
E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196

This shall serve as the Compliance Letter of Enventis Telecom, Inc. ("Enventis"), pursuant to the Enforcement Bureau's Public Notice, DA 05-2945, released November 7, 2005.

**1. Quantification, on a percentage basis, of the number of subscribers to whom Enventis is able to provide 911 service in compliance with the VoIP 911 Order:**

Enventis is in compliance of providing 911 service to 97% of its existing subscribers.

For the existing subscribers for which Enventis is currently unable to provide e911 capabilities, Enventis will permit them to continue to use Enventis' Encompass service from their Registered Locations as Enventis works expeditiously to expand its e911 service to include user's Registered Locations outside of a customer's primary Registered Location.

**2. Detailed statement as to whether Enventis is transmitting all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized (if not, explanation why not):**

97% of Enventis' Encompass VoIP subscribers are receiving 911 capabilities at their fixed, primary, Registered Location(s) from Enventis' current 911 system, utilizing subscriber-provided local 1FBs for 911 services. Enventis' current form of service agreement for its Encompass service contractually requires subscribers to obtain and maintain a local 1FB connection for this purpose. All 911 calls placed by these 911-compliant subscribers using the Enventis Encompass VoIP platform are routed out the subscriber's locations via the dedicated Wireline E911 local network using the ANI of the Registered Location. The 3<sup>rd</sup> party contracted by the subscriber for the 1FB service passes this information on to the appropriate PSAP.

Three percent (3%) of Enventis' Encompass service subscribers are not technically capable of using, and do not use, a 1FB connection for 911 services. Enventis projects it will provide 911 service capabilities to these subscribers, as described in paragraph 5 below.

The Enventis Encompass VoIP service is now offered only to businesses allowing a 1FB to support all stations/subscribers at that location. Enventis will not solicit or add new customers in areas where it does not have this 911 capability and has taken, and continue to take, steps to advise its Encompass subscribers that their service currently is a fixed 911 service to be used at the primary Registered Location.

**2.a Number of Selective Routers to which Enventis is now interconnected, directly or indirectly:**

Enventis is interconnected, directly or indirectly, to 11 routers.

**3. Detailed statement as to whether Enventis is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, including (1) a quantification, on a percentage basis, of how many answering points within Enventis' service area are capable of receiving and processing ANI and Registered Location information that Enventis transmits; and (2) if Enventis is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not:**

Enventis' Encompass VoIP subscribers are receiving 911 capabilities at their fixed, primary, Registered Location(s) from Enventis' current 911 system utilizing customer-provided local 1FBs for 911 services, as described in paragraph 2 above. Enventis utilizes incumbent local exchange carrier (ILEC) answering points within Enventis' service areas. 100% of the ILEC answering points within Enventis' service areas are capable of receiving and processing the ANI and Registered Location information that Enventis transmits.

**4. If Enventis has not achieved full 911 compliance, identification of all areas (on an MSA basis) where it is in full compliance and where it is not:**

Enventis is not fully compliant in the Minneapolis/St. Paul, Duluth and Rochester, MN MSAs. Enventis is fully compliant in Madison and Oshkosh, WI, Grand Forks, ND, Baltimore, MD, Atlanta, GA, Pittsburgh, PA, Vista, CA, Seattle, WA, and Orlando, FL MSAs.

**5. If Enventis has not achieved full 911 compliance, its detailed plans for coming into full compliance and anticipated timeframe for compliance:**

Enventis is undertaking all commercially reasonable steps to implement e911 services for its Encompass service subscribers that do not have a Registered Location served by the Encompass 911 service as outlined in paragraph 2 above. Enventis projects that in conjunction with its third party vendor, Qwest Communications, it will be able to provide e911 capabilities to the Registered Locations of all of its Encompass service subscribers by December 9, 2005. The Qwest 911 service will pass the ANI and the user's Registered Location information to the appropriate PSAP allowing Enventis to enable its subscribers to continue to receive 911 coverage when they use Encompass service nomadically within Enventis' 911-capable footprint.

**6. Detailed description of all actions Enventis has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location, including relevant dates and methods of contact with subscribers, and quantification, on a percentage basis, of the number of subscribers from whom Enventis has obtained the Registered Location:**

Enventis has undertaken an extensive telemarketing campaign from November 14, 2005 through November 25, 2005 to contact each of its Encompass VoIP service customers to obtain each existing subscriber's current Registered Location. Enventis has also put in place an installation process through which it obtains any new subscriber's initial Registered Location. Enventis has obtained the Registered Location for 100% of its current Encompass VoIP service subscribers.

**7. Detailed description of Enventis' method(s) offered to subscribers to update their Registered Locations, including whether Enventis is offering subscribers at least one option for updating their Registered Locations using the same equipment that they use to access their interconnected VoIP service:**

Enventis offers its subscribers 7 by 24 Support Center voice access to change their Registered Locations. In the near future, Enventis will provide its subscribers an additional electronic access to submit their Registered Location changes.

**8. Detailed description of any technical solutions Enventis is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically:**

Enventis projects that it will implement a technical solution through its third-party vendor, Qwest Communications, as described in paragraph 5 above. To enable the most expeditious expansion of its 911 footprint, Enventis will continue to investigate and

evaluate any additional reasonable technological solutions (i.e. Automatic Detection Capabilities) in areas served by selective routers.

Enventis is committed to the Commission's objective of ensuring that the benefits of 911 capabilities are available to customers. We look forward to continuing to work with the Commission and other parties on this important initiative.

Sincerely,

Dan Driscoll  
Enventis Telecom